

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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SUPERB MOTORS, INC., TEAM AUTO SALES, LLC,  
ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY  
AUTO LLC, NORTSHORE MOTOR LEASING LLC,  
BRIAN CHABRIER, individually and derivatively as a  
member of NORTSHORE MOTOR LEASING LLC,  
JOSHUA AARONSON, individually and derivatively as  
a member of 189 SUNRISE HWY AUTO, LLC, JORY  
BARON, 1581 HYLAN BLVD AUTO LLC, 1580  
HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD  
AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239  
HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD  
AUTO LLC, 76 FISK STREET REALTY LLC, 446  
ROUTE 23 AUTO LLC AND ISLAND AUTO  
MANAGEMENT, LLC,

Plaintiffs,

v.

ANTHONY DEO, SARAH DEO, HARRY  
THOMASSON, DWIGHT BLANKENSHIP, MARC  
MERKLING, MICHAEL LAURIE, THOMAS JONES,  
CPA, CAR BUYERS NYC INC., GOLD COAST CARS  
OF SYOSSET LLC, GOLD COAST CARS OF  
SUNRISE LLC, GOLD COAST MOTORS  
AUTOMOTIVE GROUP LLC, GOLD COAST  
MOTORS OF LIC LLC, GOLD COAST MOTORS OF  
ROSLYN LLC, GOLD COAST MOTORS OF  
SMITHTOWN LLC, UEA PREMIER MOTORS CORP.,  
DLA CAPITAL PARTNERS INC., JONES, LITTLE &  
CO., CPA'S LLP, FLUSHING BANK, and LIBERTAS  
FUNDING LLC,

Defendants.

Case No.: 2:23-cv-6188 (JMW)

**CERTIFICATION OF BONNIE  
R. GOLUB, ESQUIRE, IN  
SUPPORT OF LIBERTAS  
FUNDING, LLC'S MOTION TO  
DISMISS PLAINTIFFS'  
AMENDED COMPLAINT**

-----X  
I, Bonnie R. Golub, Esquire, do hereby certify as follows:

1. I am a partner with the law firm of Weir Greenblatt Pierce LLP, attorneys for  
Libertas Funding LLC ("Libertas"). I am fully familiar with the facts set forth herein and submit  
this Certification in support of Libertas' Motion for an Order Dismissing Plaintiffs' Amended

Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

2. Attached as Exhibit "1" to the Memorandum of Law of Defendant Libertas Funding LLC in Support of Motion to Dismiss Plaintiffs' Amended Complaint is a true and complete copy of Plaintiffs' First Amended Complaint (without Exhibits) filed with the Court on October 13, 2023.

3. Attached as Exhibit "2" to the Memorandum of Law of Defendant Libertas Funding LLC in Support of Motion to Dismiss Plaintiffs' Amended Complaint is a true and complete copy of the Agreement of Sale of Future Receipts dated November 15, 2022, by and among Libertas Funding LLC, as purchaser, Northshore Motor Leasing LLC and 189 Sunrise Hwy Auto LLC, as merchants, and Anthony D. Deo, as guarantor.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

Dated: February 9, 2024

/s/ Bonnie R. Golub  
Bonnie R. Golub, Esquire